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Director

Waste Programs Division – Solid Waste Rule Development Process Stakeholder Workshop on Revised Draft Rule June 24, 2008, 1:30-4:30 p.m. and June 25, 2008 9 a.m.-Noon

NOTES

Stakeholder workshops to obtain input and review possible modifications to the Revised Draft Rule dated June 9, 2008 was conducted on June 24 and 25. The draft rule text and updated matrix, “Solid Waste Facility Classification: Tiered Regulatory Framework” can be found at: azdeq.gov/enviro/waste/solid/integrated.html.

The stakeholder comments are noted below. Italicized comments were recorded from comment cards submitted by stakeholders. A list of attendees is attached to this document.

Opening Remarks

Solid Waste Division Director Amanda Stone welcomed attendees and thanked participants for their comments and contributions to the solid waste rule development process. She thanked staff members for their efforts on this rule. Stone noted that significant changes had been made to the June 9, 2008 rule draft in both content and structure. These changes should help stakeholders understand whether their facilities are in or out of the rulemaking.

In response to stakeholder concerns about the schedule, additional meetings will be held on July 14, from 1:30-4:30 p.m. and July 15, from 9-noon. The informal public comment period will be extended as well.

Stone noted that this draft addresses stakeholders’ concerns that the rule was overly prescriptive. The current rule draft allows small businesses to determine the best way to run their businesses. She also addressed concerns about facilities subject to this rule. By virtue of being listed in the rule, the facility is required to obtain financial assurance.

Introductions

Facilitator Theresa Gunn explained that the meeting agenda shown was for both June 24 and 25. The purpose of these meetings was to identify significant issues that merit further discussion, unintended consequences, and any areas where we agree to disagree. Gunn facilitated introductions.

Action Item

Regarding stakeholder requests for guidance on whether facilities are covered and how the new rules will be implemented, the Department will develop an implementation plan that includes how and when guidance will be given. This plan will be communicated to stakeholders.

Overview of the June 9, 2008 Draft Rule

Peggy Guichard-Watters, Waste Programs Division, provided an overview of the June 9 draft text, which will be used from this point forward. Highlights included:

- The rule will be renumbered properly.
- Article 3, which applies to solid waste facilities in the non-facility world, is no longer included in this rule package. However, Article 3 will continue to apply in its current form. The agency will open a docket for Article 3 in a few months.
- Article 4 was eliminated. These requirements are now included with the facility requirements.
- The rule is currently in the informal process.
- The rule is critical to the agency.
- This rulemaking deals with solid waste facilities only. The agency opted not to address all solid waste facilities, only those listed.
- Staff has attempted to better address where facilities fit into the rule.
- We responded to concerns that the level of environmental concern should be more in line with the level of regulation, and that MSWLFs and non-MSWLFs should be regulated separately.
- All definitions appear in Article 1. In the future, when articles 3, 13, 14, and 16 are opened, those definitions will be included in Article 1 as well.
- Each article is set up to provide a list of facilities, general requirements, and additional requirements.
- All solid waste facilities that are covered by this rule package are subject to financial assurance requirements in Article 18.

Stakeholders were in consensus that this draft was easier to read and understand.

Article 6 – BMP Facilities

Veronica Garcia, Waste Programs Division, reviewed Article 6. Changes made after the draft was distributed included:

- Definition of “waste to energy facility” means a facility whose principal function is to convert, combust, or otherwise process solid waste by incineration, pyrolysis, destructive distillation, or gasification, or to chemically or biologically process solid wastes, for the purpose of synthetic fuel production or energy recovery.
- Definition of “incinerator” means an enclosed unit that burns solid waste without energy recovery.
- Changes made to tank requirements include deletion of the reference to the 25-year, 24-hour storm event.

Additional highlights from her presentation, other staff comments, and responses to stakeholder inquiries included:

- Regarding Section 609, statute specifies that a permanent household hazardous waste facility is open at least six days per year.
- If a facility is already part of a plan approval process, that facility will not need another notice.
- In Section 601(D)(8), identification of learning centers is used for informational purposes only. Facilities do not need to notify the agency of new learning sites that open. This information will not be used to limit locating a facility.
- In Section 602, all BMP facilities are required to provide financial assurance.
- A new facility needs financial assurance in place when they operate. *(Staff noted this wording may be confusing and will be reviewed).*
- Household chemicals from a household are solid waste. Once these items are consolidated at a facility, they may become a hazardous waste or a solid waste.
- It is only upon bulking of household hazardous waste that the waste is considered hazardous. *(Staff later revisited this point and the preceding bullet and indicated that household hazardous waste that is consolidated **does not** become hazardous waste unless it is commingled with CESQG or hazardous waste.)*
- Financial assurance must be provided for both the landfill and the household hazardous waste collection center when the center is located on the landfill property.
- The general requirements of Section 603 do not apply to the Navajo Nation.
- Community recycling bins are not being addressed in this rule package.
- In Section 603(D), only the area where the solid waste is stored is subject to the run-on/run-off requirement.
- In Section 604, it is at the discretion of the facility to have a means for two-way communication. A two-way radio or cell phone is acceptable.
- Section 605(G) basically says that if you have chosen not to close as a BMP facility, you will then close it as a solid waste facility.
- Sections 601-606 apply only to those facilities listed in Section 600.
- Section 605(D) means that a facility needs to receive solid waste at least once per year to avoid having to comply with closure requirements.
- The closure plan and financial assurance instrument are compared to determine if the financial assurance is adequate.
- We agree that it is not feasible for someone to call the Department from an unmanned transfer station within 24 hours.
- In Section 607(H), staff would like to have these records at or near a facility in order to facilitate inspections. Online access would also accommodate this need.
- Counties will need to provide input on Section 611 because these tire provisions were not part of the previous rule draft.
- Separate facilities are not needed for household hazardous waste and CESQG waste. Hazardous waste is meant to mean RCRA hazardous waste.
- In Section 609 and Section 610(I)(1) the labeling and dating is required on the drum only, not individual containers. We will clarify this language.
- Section 611(B)(1) allows for 20 foot wide access routes and 20 foot wide buffer zones, for a total of 40 feet between tire piles, and 40 feet between tires and other stored materials that are not tires.
- It is not our intent to regulate closed-loop recycling here.

Article 6 stakeholder questions and comments follow.

Section

R18-13-600

- Clarify or define solid waste having the potential to create leachate. *(Staff will do so.)*
- Can we calculate daily through-put based on annual average?
- If you don't intend to regulate a facility, a list of exemptions should be provided.
- What method is used to calculate 180 cu. yds.?
- If we only have a material recovery facility is it still a solid waste facility?
- (1) – Phrase “including a material recovery facility brings in non-regulated facilities.
- (4) – Change “industrial solvents” to “solvents.” This sounds like a hazardous waste. *(Staff will consider this change.)*
- (4) – *Less than or equal to 180 cubic yards of solid wastes and stored for less than 90 days. I recommend that 180 days are used for collection. 90 days are related to a LQG. 180 days seems more appropriate for SQGS.*
- (4) – *This identifies solvents, antifreeze, or CESQG. Does less than or equal to 180 cubic yards apply as an aggregated amount with all of the waste streams?*
- (6) – A solid waste facility with only asbestos falls into the BMP category, whereas a solid waste facility with asbestos and other materials would not be included and would fall into another category.

R18-13-601

- Some of the requirements are not mandated in statute. May want to scale this back, especially for simple BMP facilities.
- A change of solid waste practices should also trigger a notice.
- (C) – Section should specify who the notice should be sent to. This applies throughout the rule.
- (D)(3) – This should include financial assurance.
- (D)(3)(b) – Should use “entrance of a facility” not use the longitude and latitude.
- (D)(3)(b) – *Rather than locate the facility at the front gate as one commenter suggested, locate the geographical point of the facility at the center of mass (COM) of the property. Locating property COM would assist computer modeling for environmental impacts.*
- (D)(8) – How do you get a list of learning centers?
- (D)(8) – What about a facility that is K-3, not specifically K-12.
- (D)(9) – I would guess that all of these facilities will be 179 cu. yds.

R18-13-602

- What is post-closure care for a BMP facility? I would suggest that you don't allow people the option to do anything other than a clean closure.
- Closure requires all solid waste be removed. This results in an unintended consequence for asbestos disposal in an asbestos monofill.
- I would like to know the citation or where the concept of household hazardous waste becoming a hazardous waste at a facility.
- (A) – How would a household hazardous waste facility require financial assurance when there is no closure? I can't assume it will be clean.

R18-13-603

- A better definition of material recovery facility is needed to understand what is not included.
- (A) – What kind of security do you mean? How do we know if it is adequate to control public access, etc.?
- (B) – I would prefer a sign showing what is accepted, or giving operators that option.
- (D) – This seems burdensome to the small operator.
- (D, E) – If this section is patterned after Subtitle D, the 25-year, 24-hour storm reference is not consistent.
- (E) – This is more stringent than the federal program.
- (F) – Suggest adding (6) to the statute citation to clarify the intent.

R18-13-604

- The utility requirement is rather excessive for BMP facilities.
- I appreciate the less prescriptive mindset, however, in areas where there is doubt, I am not comfortable that reasonable minds will always prevail.
- What is an “evaluation?”
- (B) – There is no way to comply with “adequate fire fighting equipment.”
- (B) – “Sufficient personnel” is subjective.
- (C) – “Create and regularly update” is subjective.
- (C) – “Imminent and substantial endangerment” is subjective.
- (E) – “Regularly updated” is subjective.
- (E)(3) – How detailed an evaluation is needed?

R18-13-605

- Does an asbestos monofill fall in the BMP category?
- There are inconsistencies regarding what is required to release financial assurance.
- (A) – When does the written closure plan have to be completed?
- (C) – Add “subject to BMPs.”
- (C) – Could I start earlier than 90 days?
- (C) – What if I am not disposing, just storing a bit longer?
- (D) – What about rural communities that don’t receive anything once per year.
- (E)(3) – “Owner, operator, or Department” is awkward and confusing.
- (E)(3) – May be too loose of a standard to use as a trigger.
- (F) – Implies agency review; operating record. *(Staff note: Operating record section will be removed.)*
- (E)(4) – If it is a clean close, can we take the fence down?
- (F, G) – 30 days does not allow for completion. If anything needs to be done, it would undoubtedly take longer than 30 days.
- (G) – What is the statutory authority for turning a BMP into a plan approval facility.

R18-13-607

- In the case where a facility is unmanned, I would prefer signage.
- In waste screening, “implement” is going to be hard to enforce.
- 24-hour notifications would be numerous. How will the Department deal with these? An example would be one can of paint.

- (D)(3) – What is the expectation in covering roll-offs?
- (D)(3) – I can't guarantee that a fly or a bird won't get in.
- (E) – Change to "to handle solid waste that is in a liquid or semi-liquid state."
- (E)(1) – Says "all new tanks." This implies it does not apply if I buy an old tank.
- (E)(1) – What is the standard test for tank tightness?
- (E)(1) – 24-hour, 25-year should be reviewed.
- (E)(2) – Should read as simply "operate so that it does not release..."
- (E)(5) – Text regarding soil does not necessarily need to be there.
- (E)(6) – I question the state's authority. This is a zoning issue.
- (E)(6)(a) – Use singular "tank system."
- (F) – "Likely to produce leachate" definition is needed.
- (I) – The definition of liquid waste should have some caveats like those found in Subtitle D.
- (I) – I suggest we change the definition and define liquid waste materials up front. Consider "anything commonly found in a house."

R18-13-608

- What is the definition of putrescible? Could be interpreted here as grass clippings. (*Staff note: We believe this was included in Article 3.*)

Article 7 – Self-Cert Facilities

Highlights from Garcia's presentation, other staff comments, and responses to stakeholder inquiries included:

- In Section 700(A)(7), putrescible wording was added.
- Sections 700 (A)(11) and (12) will be combined. This refers to liquid waste brought to another site to be treated. APP will continue to cover impoundments.
- In a material recovery facility, such as residential recycling pickup, the sorting would be regulated as a self-cert facility.
- In Section 701, substantial change does not refer to Type I-IV changes. We may also add language regarding design and construction.
- Regarding Section 701(H), we believe statute requires the agency to consider facilities accepting, treating and storing recyclable solid waste.
- We are trying to avoid duplicating regulations. However, areas such as universal waste may fall under these rules.
- APP and stormwater are called out as not subject to these requirements.
- Recycling of universal waste will be regulated in this solid waste rule.
- We are not ignoring the HW exemption. We are only attempting to include facilities that have fallen through the cracks. Further, it is not our intent to regulate this area with the same rigor as RCRA C regulations.
- The emergency preparedness measures and closure requirements found here are similar to the language found in Article 6.
- We may change "incineration" to combustion.

Stakeholder comments follow.

Section

R18-13-700

- There may be a conflict with waste piles as shown in Article 6.
- In the industry, we use MRF and recycling interchangeably.
- (A)(10) – “Stored” – *Would a generator who just stores prior to shipment be included under this section?*
- (B) – Appears to regulate the paper mill in Snowflake.

R18-13-701

- “Substantial change” is used in statute. Should use same language here.
- Problematic areas include certifying compliance to amorphous standards, and PE certification of these amorphous standards.
- Is the intent here to impart additional regulations, such as for universal waste? See 40 CFR Part 273. Need to state that those covered by existing rules are not subject to these additional requirements.
- I thought you were either covered by HW rules or SW rules.
- Have those who recycle universal waste been notified that they will now be included in the SW rule?
- If CESQGs are recycling solvents, then a sloppy operation allows ADEQ to regulate these operations as HW facilities.
- The statute that addresses ADEQ’s HW rules state that they cannot be more stringent than federal requirements.
- (B) – This excludes HW, and therefore universal waste.
- (B) – If we are going to ignore the exclusion for HW, we need to consider the unintended consequences, which include adding these facilities to SW facilities, adding RCRA facilities to the SW world.
- (B)(1, 4) – This is trying to regulate a manufacturing process and adds a layer of bureaucracy resulting in an impediment to these recyclers.
- (F)(6) and (G)(3) – Both use “operator, owner, or both.” This is unclear.
- (H) – Changes requiring recertification would be costly.

Article 11 – Plan Approval Facilities

Robin Thomas, Waste Programs Division, reviewed Article 11. Highlights from her presentation, other staff comments, and responses to stakeholder inquiries included:

- Section 1101(A)(1) rolls in surface impoundments with leachate. (A)(6) includes certain tire sites.
- We will look at special facilities, such as APP-covered facilities, and make certain we are clear.
- New monofill or fly ash facilities would require new plan approval.
- If a facility is already permitted with an APP, the facility can remain with that permit for modifications.
- Existing facilities with a plan approval may be affected. Hopefully transitional language will address this issue. For example, a closed landfill would be left alone.
- It is not our intent to regulate mulchers or green-only waste.
- Green-only waste will be covered as a self-certification facility, not under Article 11.
- Section 1102 clarifies Type III and Type IV changes.
- Facilities can use cubic yards or acres to calculate the 10 percent approval.

- Section 1104 applies to MSWLFs. Location restrictions come from statute and 40 CFR Part 258.
- Section 1105 incorporates 40 CFR Part 258, where possible, and statute.
- We removed items from Section 1106 that were more stringent than federal regulations.
- We will approve alternative daily covers on a facility-by-facility basis.
- Sections 1107-1112 are a combination of groundwater requirements from Part 258 and APP.
- We will change Section 1113(E) since it is inconsistent with other facilities in the rule in that it only calls for notification of the Director.
- The intent in Section 1115(C) is to give existing landfills the opportunity to transition into compliance with aquifer protection standards in this rule. We will revise language to specify aquifer protection standards.
- In Section 1116, we added Part 254 permit demonstration language in response to previous comments.
- Section 1121 contains references to MSWLFs to avoid repetitive language. The design standards in (B) reflect those in APP.
- In the case of a non-MSWLF located within a broader facility such as a mining site, if a facility is permitted, it would require a change. Facilities that may have fallen through the cracks need to get covered either separately or through the area wide APP.
- We pulled the Section 1122 information into the facility plan to simplify the process.
- Section 1123 adds closure standards for surface impoundments.
- Section 1125 does not cover green-only waste. Also, we haven't seen a size limitation noted in statute.
- Section 1126 is new, and includes a closure requirement. The statutory definition of tires is used here.
- It is not our intent to re-regulate biosolids already under another program.
- Green waste does not include food waste, or household waste.
- The definition of a medical waste facility is in Article 14. Generators usually do not require plan approval, but treatment and disposal facilities probably do.

Stakeholder comments and questions included:

- I am concerned that APP-covered facilities might be unintentionally pulled in by this language.
- It is not clear in the language whether there is an exclusion for green waste.
- Lateral expansion is defined in statute. I would like to see this clarified in rule.

R18-13-1102

(D)(3)(h) – There are conflicts with Type III and IV changes.

(D)(3)(d) – It is not clear that a like-like exchange would not be categorized as a Type III change. *(Staff noted that they will clarify.)*

(D)(4)(b) – This is a Type IV change and Part 258.

R18-13-1105

(C) – Propose we add GCL to the list of accepted liners, as it provides protection equivalent to the FMLs that are in the rule. *(Staff will discuss this issue offline.)*

R18-13-1106

(C)(3, 4) – Are these Type III or Type IV requirements?

R18-13-1107

- Groundwater monitoring waiver provisions have been left out and we are distraught by this omission.
 - Doing APP for a MSWLF could put the small landfills out of business.
 - Monitoring would be costly as well.
- (B)(2) – Some existing wells are not located on land owned by the landfill owner. (Staff noted this would be considered a transition issue.)

R18-13-1110

- Does this apply to existing MSWLFs?

R18-13-1114

(B)(1) – How does ADWR fit with this requirement?

R18-13-1115

- Lateral expansion was not included.
- (A)(1) – I haven't seen a requirement for the actual number of days in operation previously. *(Staff will check to see if this is consistent with federal definitions.)*
- (C, D) – This is more restrictive than federal standards.
- (C, D) – A Type III or IV change would mean we are no longer allowed to be exempt from groundwater monitoring. *(Staff note: A demonstration can be made to avoid this situation. We are working on a revision to allow meeting APP requirements.)*
- 1116 – Can we add other RD&D projects such as alternative materials to be used in baseline language? *(Staff noted this was probably covered under BADCT.)*
- 1123(D)(1) – Would be hard to remove all SW from a facility, such as that in the ground.
- (D)(2) – This could be leachate or liquid.

R18-13-1125

- Regarding non-in-vessel composting, containment in Section 1125 and Article 7 is hard to understand because we aren't sure if it is prior to treatment or during. *(Staff noted that non-in-vessel treatment would have to take APP into account, and that the intent was at staging.)*
- Composting and green waste is going to be a hot issue in the near future. It will initially be a money-losing endeavor, like recycling, until it is established. Therefore, we are particularly concerned about how these operations will be regulated.
- The term household waste does not exclude green waste. Green waste is not defined.

Article 11 – Human Excreta

Highlights from Guichard-Watter's presentation included:

- With the following exceptions, this article is identical to that found in the previous draft.
- Definitions have been moved to Article 1.
- We removed some language at the request of the counties regarding the size of containers and certain fly-tight requirements.

Article 18 – Financial Assurance

Highlights from Mark Lewandowski, Waste Programs Division, other staff comments, and responses to stakeholder inquiries included:

- Article 18 generally follows language which is already on the books, including APP.
- ~~We~~ Staff will review the use of “assure” and “ensure” for accuracy.
- The Article does not allow for captive providers of financial assurance.
- There is a statutory requirement that closure certification come from a PE or other acceptable professional in order to remove financial assurance.
- In Section 1802(J)(2) the ~~update~~ requirement is ~~from statute~~, and that the mechanism must extend 90 days beyond the date the update is due is from statute. ~~Staff will~~ Solid waste facilities need to review this process with providers of financial assurance to determine how it will work.
- Regarding Section 1802(E)(4), facilities ~~will often~~ may be able to note that there would or would not be a cost change in their submittals plan. If there is not a cost change, the financial assurance would not have to change.
- Statute requires the update of the policy and an assumed rate of inflation ~~cannot be used~~ will not be automatically approved.
- The so-called 10 K report is no longer accepted under APP for publicly traded companies.
- If your type of solid waste facility is mentioned in this rulemaking you must have financial assurance.

Stakeholder comments included:

R18-13-1802

(C)(8) – Is this a new requirement?

Article 21 – Fees

Highlights from Thomas, other staff comments, and responses to stakeholder inquiries included:

- The previous sections 2101, 2102 and 2103 have been moved to other locations.
- Section 2103 updates the hourly rate.
- Fees are a big issue for the agency because the fees allowed in statute do not accommodate actual costs and will result in the inability to approve permits and respond to requests.
- Currently, landfills under closure continue to pay fees until they receive a closure letter.
- Reallocating the 25-cent per ton recycling fee would require a statutory change.

Stakeholder comments included:

- For duplicative requirements, such as zoning and other environmental permits (in Article 7) I suggest leaving these out and not including them as part of the rule. This would avoid bouncing permission back and forth from one agency to another.

R18-13-2109

(C) – I don’t believe a landfill is still a solid waste facility if it is closed. I don’t think this reads as described.

Gunn asked stakeholders to identify agenda items for the July 14 and 15 meetings. Suggestions included:

- Rural unmanned transfer stations.
- Differences between a facility that accepts its own waste as CESQG waste, vs. a facility that accepts outside waste.
- I would like to see a redlined or revised copy of changes that staff noted prior to July 14.
- Balance between prescriptive standards and using Part 258 (e.g. GCL, which is used at 90 percent of Arizona sites).
- More review of the transition Section 1115 to allow for options, groundwater monitoring issues for closed landfills.
- Explanation of reference of HHW as HW at collection centers.
- More clarification regarding collective facilities on one site and financial assurance (e.g. a transfer facility, plus waste tire collection, etc.).
- Examples of rule application to a material recovery facility, a recycling facility, and a composting facility.

Areas we may agree to disagree:

- Regulation of the recycling process.
- Impact of APP to small landfills.

Areas with unintended consequences:

- Closure requires all solid waste be removed.
- Adding RCRA facilities to the SW world.
- Definition of antifreeze – some do not have hazardous components and should not be included.
- County waste tire issues.
- Waste from a CESQG may not be hazardous.
- Outreach may be too onerous at smaller locations.

Attendees, including those participating via conference call included:

Joe Abate, NSWMA
 John T. Barlow, Arizona Strip Landfill Corp.
 Ken Bauer, BRI
 J. S. Biedenharn, Coconino County
 Pat Bourque, City of Flagstaff
 Garth Bowers, Cornerstone Environmental Group
 Kelly Byers, Pima County Solid Waste
 Donna Carlson, CRM
 Jerry Carlson, City of Glendale
 Don Cassano, Waste Management
 Dean Cooke, Arizona Strip Landfill Corp.
 Curtis Cox, Arizona Attorney General's Office

Barton Day, Bryan Cave LLP
 James Denson, Waste Management
 Scott Donovan, City of Flagstaff
 Jeff Drumm, City of Tucson -- E.S.
 Jesse Duarte, City of Peoria
 Joe Giudice, City of Phoenix
 Mary Helen Giustizia, City of Tempe
 Andrew Gough, Hoque & Assoc.
 Larry Hawke, Pima Cty. DEQ
 Lauren Hertz, City of Flagstaff
 Thomas Hillmer, APS
 Enamul Hoque, Hoque & Assoc.
 Joel Olea, City of Yuma
 Martin Jones, Gallagher & Kennedy

Douglas Junk, Cornerstone Environmental
Group
Jon Kawaguchi, City of Glendale
Stuart Kent, City of Glendale
Tom Kistler, Compliance Assurance Assoc.
Bryce Mares, Freeport McMoran Miami
Inc.
Jim Mikolatis, Tucson Env. Services
Ken Miller, Pinnacle West
Robert Mills, APS
Linda Moll, Healthcare Medical Waste
Services
Alfonso Monquillo
John Moody, Miller, LaSota & Peters
Matt Morales, City of Flagstaff
Donna Moran, Town of Gilbert
Martha G. Mottley, Freeport-McMoran
Copper & Gold, Sierrita

Karl Moyers, Santa Cruz County
Kent Norton, Freeport-McMoran
Cullin Pattillo, Mohave County
James Peck, SWANA
Mark Prein, APS
Ken Robinson, City of Flagstaff
Gus Schneider, Bryan Cave LLP
Mark L. Schumacher, Freeport-McMoran,
Bagdad
Sheree Sepulveda, City of Chandler
Stephen Smith, Hydro Geo Chem, Inc.
Jacqueline Strong, City of Chandler
Scott Thomas, Fennemore Craig
Mike Traubert, ADOT Office Env.
Services
Michelle Woytenko, City of Glendale
Lori Zito, URS Corp.